

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SCHRADER CELLARS, LLC,

Plaintiff,

v.

ROBERT M. ROACH,

Defendant.

Case No. 21-cv-01431-SK

SPECIAL VERDICT FORM

1. Do you find Randy M. Roach ("Roach")'s breach of his fiduciary duties as an attorney was a substantial factor in causing Schrader Cellars, LLC ("Cellars") harm?

Yes ☒ No ☐

If Yes, proceed to Question 2. If No, sign and return the verdict. No further questions need to be answered.

2. Do you find that on or before September 2, 2019, Cellars knew, or with reasonable diligence should have discovered, the facts of Roach's alleged wrongful act or omission?

Yes ☒ No ☐

If Yes, proceed to Question 3. If No, proceed to Question 4.

3. Do you find Cellars sustained actual injury from Roach's breach of his fiduciary duties before September 2, 2019?

Yes ☐ No ☒

If No, proceed to Question 4. If Yes, sign and return the verdict. No further questions need to be answered.

4. Do you find that the gravamen – or heart – of the claim that Cellars brings for breach of fiduciary duty against Roach is based on his filing of the Texas lawsuit?

Yes ✓ No _____

If No, proceed to Question 5. If Yes, sign and return the verdict. No further questions need to be answered.

5. What damages do you find that Cellars incurred as a result of Roach's breach?

Amount: _____

Proceed to Question 6.

6. Should Schrader Cellars receive prejudgment interest on its loss?

Yes _____ No _____

Sign and return the verdict.

Jenna Vacca
(Signature of jury foreperson)

3/10/23
Date